

From: Cynthia Caporale/ESC/R3/USEPA/US
Sent: 2/27/2012 4:39:37 PM

To: [Ex. 4 - CBI]
CC: [Ex. 4 - CBI] Gary Newhart/CI/USEPA/US@EPA; John Gilbert/CI/USEPA/US@EPA; Kelley Chase/R3/USEPA/US@EPA; Sella Burchette/ERT/R2/USEPA/US@EPA; Robin Costas/ESC/R3/USEPA/US@EPA; Stevie Wilding/ESC/R3/USEPA/US
Subject: Re: Verification/Completeness Check for File 1202013 FINAL PART 2 of 3 R33907 02 11 12 1537.pdf
Posted Feb 13

The report on the Dimock Verification/Completeness Check for file 1201013 FINAL Part 2 of 3 R33907 02 11 12 1537.pdf was reviewed and below are the responses for your consideration.

File 1201013 FINAL PART 2 of 3 R33907 02 11 12 1537.pdf

1. For SVOC analysis, the low level spike recovery for 2,4-dinitrophenol associated with sample FB-01 was 0%. It cannot be determined from the laboratory report if this low level spike is at the LOQ. Since this is a problematic compound, should the "UJ" be changed to unusable "R" for this sample?

Response: The low-level spike concentration for 2,4-dinitrophenol is at the LOQ (limit of quantitation) of 5 ug/L. The mid-level spike result did show acceptable recovery. Therefore, we don't recommend qualifying "R;" however, elevating the quantitation limit to the mid-level spike value might be more appropriate. (Note: This is why "UJ" qualifier is used - notes an issue with the normal quantitation limit but other quality control results were acceptable) For future reports related to this project we will elevate the QL; however, this is not our typical practice.

2. For SVOCs, it appears that flags were assigned to samples based on contaminants found in the corresponding method blanks; however, it appears that samples were not qualified based on contaminants in the corresponding field blanks. The Region needs to decide if this is or should be part of their validation process. For example when using the National Functional Guidelines for Data Review, the samples are first qualified on the basis of the method blank and then the field blank (and in the case of VOCs the trip blank also). This would eliminate most of the "J" values reported (>MDL but <RL and the results raised to RL). As an example, the samples prepped on 1/29/12 are associated with B22901 and also FB-02 and FB-03. Many of the contaminants present in the blanks are very similar in concentration to the samples.

Response: These samples were qualified based on Field Blanks. Please provide more specific information on which analyte you feel is not qualified. (Was these qualifiers missing from the EDD?)

3. For SVOCs prepared on 1/31/12 in B23102, the 2-methoxyethanol recovery for LCS_BS1 was 0%. Since this recovery was 0%, should the samples that were non-detect be reported as unusable "R" instead of "UJ"?

Response: The mid-level spike result did show acceptable recovery. Therefore, as stated above, we don't recommend qualifying "R" however, the quantitation limit could be elevated to the mid-level spike value. For future reports related to this project we will elevate the QL; however, this is not our typical practice.

4. For VOC analysis, there doesn't appear to be any precision and accuracy data for Freon 113, methylacetate, methyl cyclohexane or MTBE for the LCS or the MS. The Region needs to decide whether these results should be flagged as estimated "J" or a note placed in the case narrative stating that these data are not available for these compounds.

Response: The above note also applies to cyclohexane. Not all LCS compounds are reported in the lab report due to issues with the Laboratory Information Management system; however, this information is available in the case files. We do not have an LCS for Freon 113, methyl acetate, MTBE, cyclohexane or methyl cyclohexane. These are part of the matrix spikes done for samples 1201013-14 and 1201013-33. Recoveries for all 5 compounds were within limits of 80-120%, except for sample 1201013-14 for cyclohexane (122%) and for sample 1201013-33 for methyl acetate (124%).

5. For the acetone result flagged as "K" on the report table and in the case narrative, should a "J" flag also be entered indicating that this result is an estimated value probably biased high?

Response: Notes and Definitions page does state that a result qualified with a "K" is estimated. At the project level any "L" or "K" qualifier can be changed to "J" as estimated. The "L" and "K" qualifiers are providing information on bias. We do not recommend using both the "J" and the "K" together.

6. It is assumed that all required instrument QC (RSD, %D, minimum response factors, etc.) specified by the method was run and was within the criteria listed in the EPA R3 SOPs since this information is not available in the laboratory report.

Response: This assumption is correct and future reports will include a statement in the narrative.

Overall, based on the above comments and response an impact to result values or qualifiers does not seem warranted.

If you should have any questions or need further discussion on the above response please feel free to contact me or Robin Costas at 410-305-2659.

Cynthia Caporale, Chief
OASQA Laboratory Branch
U.S. EPA Region III
Environmental Science Center
Fort Meade, MD
(410) 305-2732
Fax: (410) 305-3095

From: [Ex. 4 - CBI]
To: Kelley Chase/R3/USEPA/US@EPA, Cynthia Caporale/ESC/R3/USEPA/US@EPA
Cc: John Gilbert/CI/USEPA/US@EPA, Gary Newhart/CI/USEPA/US@EPA, Sella Burchette/ERT/R2/USEPA/US@EPA, [Ex. 4 - CBI]
[Ex. 4 - CBI]
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.....is attached.

[Ex. 4 - CBI]
Lockheed Martin
Scientific, Engineering, Response and Analytical Services (SERAS)

[Ex. 4 - CBI]
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[attachment "SERAS-001-DSR-021612_3.docx" deleted by Cynthia Caporale/ESC/R3/USEPA/US]